


Reconsideration of the application as amended is respectfully requested. In the first Office Action, claims 1 and 5 were rejected under 35 U.S.C. 102 in light of a patent issued to Roach. Though the device in Roach is similar to the present invention, it lacks several important features. The device in Roach includes a brush mounted a pair of spaced arms, 12,13. The patent does not disclose or suggest mounting a tubular brush onto a motorized peg at one end and a spring-biased pin at the other end. The design allows the brush to be easily removed for maintenance or when attaching any one of a plurality of sleeves thereto. The patent issued to Roach does not disclose or suggest the use of interchangeable cleaning sleeves, thus making the spring-biased pin feature unnecessary and irrelevant.

Regarding claim 6 directed toward the interchangeable sleeves, the examiner cited the German patent to Speich. The brief English translation merely discloses a "replaceable toweling sleeve", as opposed to *any one of a plurality of removable interchangeable sleeves, each sleeve having an exterior surface with a discrete cleansing surface thereon allowing a user to vary the cleansing surface of the scrubber as desired* as provided in new claim 7. In fact, the document does not disclose the purpose or motivation for having a toweling sleeve. Furthermore, because the patent is written in a foreign language, it vague and ambiguous and therefore should be strictly construed. For the foregoing reasons, applicant respectfully avers that the claims are allowable in light of the references cited herein.

Respectfully submitted,


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